IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

GLOBAL BROTHER SRL, a Romanian)	
Societate cu Raspundere Limitata,)	
)	
Plaintiff,)	Case No.:
)	
V.)	
)	
WILLIAM GIBSON, an individual and d/b/a)	
"Saving Solutions Shop",)	
)	
Defendant.)	
)	

COMPLAINT FOR COPYRIGHT INFRINGEMENT AND OTHER RELIEF

Global Brother SRL, a Romanian Societate cu Raspundere Limitata ("Plaintiff"), by and through its undersigned counsel, files this Complaint against, Defendant, WILLIAM GIBSON, an individual and d/b/a "Saving Solutions Shop" and in support thereof states the following.

NATURE OF THE ACTION

This is a civil action for claims arising under the Copyright Act of 1976, 17 U.S.C. §§ 101 et seq. and for associated intellectual property and business violations under federal and Illinois law. This action is to address, inter alia, the unauthorized reproduction, distribution, advertising, use, and display of Plaintiff's protected works on-line.

1. Plaintiff is a worldwide publisher of popular books directed to health and wellness. It has invested substantial resources in creating, distributing, advertising and protecting its books, contents, and images thereof – as according to the protections granted by U.S. copyright, trade dress, trademark, and related intellectual property rights (the "Plaintiff's Works").

- 2. Defendant, without authorization or license, engaged in the unauthorized reproduction, distribution, advertising, use, and display of Plaintiff's Works, including at <savingsolutionsshop.com> to misrepresent source, misrepresent rights, mislead and divert consumers in this District, causing confusion, financial and reputational harm to Plaintiff and Plaintiff's Works.
- 3. Through this action, Plaintiff seeks to protect its exclusive rights and prevent harm to continue to be caused by Defendant. Plaintiff seeks injunctive relief, statutory damages, actual damages, attorneys' fees, and other relief as just and proper.

JURISDICTION AND VENUE

- 4. This Court possesses subject matter jurisdiction over the action under 28 U.S.C. § 1331, as the claims arise under the Constitution, laws, or treaties of the United States, including but not limited to the Copyright Act (17 U.S.C. § 101 et seq.) and the Lanham Act (15 U.S.C. § 1051 et seq.).
- 5. This Court further has exclusive jurisdiction over the claims arising under federal copyright and trademark law under 28 U.S.C. § 1338(a), which grants original jurisdiction to federal district courts for all civil actions arising under any Act of Congress relating to copyrights, trademarks, or unfair competition.
- 6. This Court also has jurisdiction under 15 U.S.C. § 1121, which provides that the district and territorial courts of the United States shall have original jurisdiction over all actions arising under the Lanham Act.
- 7. This Court additionally has supplemental jurisdiction over Plaintiff's state law claims under 28 U.S.C. § 1367(a), as the state law claims are so related to the federal claims that they form part of the same case or controversy under Article III of the United States Constitution.

- 8. Venue is proper in this District under 28 U.S.C. § 1391(b) as Defendant direct unlawful activities toward this District, including conducting business, advertising, selling, and/or distributing infringing products within this District.
- 9. Defendant is subject to this Court's jurisdiction because, pursuant to the Digital Millennium Copyright Act (DMCA) Counter-Notice, and public records, Defendant is located in this District, conducts business in this District, and, expressly consented to jurisdiction in this District pursuant to Exhibit B.

PARTIES

- 10. Plaintiff, Global Brother SRL, is a Romanian Societate cu Raspundere Limitata (SRL) organized and existing under the laws of Romania, with principal place of business located at Ghiozdanului 22A Lighthouse Residence, Bucharest, Romania (the "Plaintiff"). The Plaintiff is engaged in the business of creating, publishing, selling, distributing, and advertising books in the United States and internationally. Plaintiff owns and holds all rights, title, and interest in and to the intellectual property associated with its book, THE LOST BOOK OF HERBAL REMEDIES (see, e.g., Exhibit A, Plaintiff registered U.S. Copyright abstracts and image of book, cover). Rights associated with the foregoing include trade dress and common law trademark rights.
- 11. Defendant, WILLIAM GIBSON, is located in this District, and conducts business as himself and as "SAVING SOLUTIONS SHOP" with an address at 1113 16th Avenue, Rockford, IL 61104. He is in the business of retailing various goods including books, which he causes to be sold, advertised and delivered in U.S. commerce, including to residents of this State. He controls and owns the <website savingsolutionsshop.com>, which website advertised and displayed offending content complained of herein at on in associating with the following links, https://savingsolutionsshop.com/products/the-lost-book-of-herbs-the-healing-powers-of-plant-

medicines?_pos=1&_sid=b7c31ca9a&_ss=r (the "Offending Website"). Defendant filed a DMCA Counter-Notice (Exhibit B) confirming foregoing allegations.

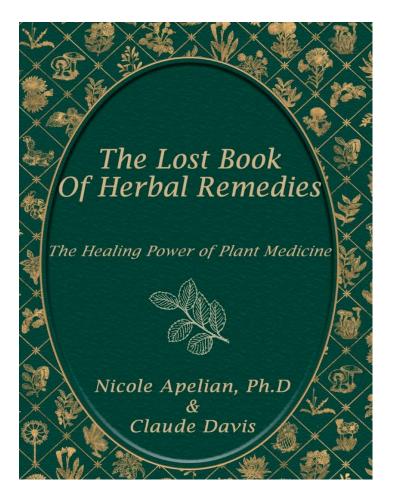
FACTUAL BACKGROUND

- 12. Plaintiff is the exclusive owner of all rights, title, and interest in and to THE LOST BOOK OF HERBAL REMEDIES based on, but not limited to its registered copyrights, common law trademark rights and distinctive trade dress on and in association with books, related images, texts and designs:
 - TRADEMARK: Plaintiff has acquired common law trademark rights in the title and cover for its book THE LOST BOOK OF HERBAL REMEDIES through continuous and extensive use in commerce, resulting in strong consumer recognition, including as #1 best seller on AMAZON: https://www.amazon.com/Lost-Book-Remedies-Claude-Davis/dp/1732557101:



• TRADE DRESS: Plaintiff's trade dress includes the distinctive design comprising its title, layout, font style, color scheme, and associated imagery. Its trade dress is inherently distinctive and has acquired secondary meaning in the marketplace, signifying to consumers that the origin is from Plaintiff.

- COPYRIGHT: Plaintiff owns non-U.S. and U.S. Copyright Registrations for THE LOST BOOK OF HERBAL REMEDIES inter alia, the book, text, artwork, videos and website as in TX0009021932, VA0002369247, TX0009411164, PA0002339379, TXu002422674, and TX0009431664 (Exhibit A, image of cover and U.S. Copyright Office abstract, printouts).
- 13. The foregoing, THE LOST BOOK OF HERBAL REMEDIES, comprises: a book cover having a background that is a deep, forest green hue, overlaid with a repeating diagonal lattice formed by fine gold lines. Within each diamond-shaped cell of the grid, there appears a detailed, stylized botanical illustration—each rendered in gold ink—depicting a unique plant, flower, leaf, or mushroom form. Centrally positioned on the cover is an elongated, vertically oriented oval frame outlined in gold. Enclosed within this oval, the title in serif, also in gold, The Lost Book of Herbal Remedies, The Healing Power of Plant Medicine. Beneath, there is a centered botanical illustration—a monochromatic gold drawing of a small plant stem with five serrated leaves. Following the visual, are authors' names displayed as: Nicole Apelian, Ph.D & Claude Davis (Exhibit A).



- 14. THE LOST BOOK OF HERBAL REMEDIES has been extensively marketed, distributed, and sold in the United States since at least as early as 2019, generating substantial consumer recognition and goodwill. As a result of this continuous use and promotion, Plaintiff has established enforceable rights in the content, title, design, and associated trade dress.
- 15. On or about May 22, 2025, Plaintiff discovered unauthorized version(s) of its THE LOST BOOK OF HERBAL REMEDIES published, advertised for sale, and being sold for profit on the Offending Website (the "Offending Use"). The following is a representative image of the Offending Use:



16. The Offending Use is an exact copy of Plaintiff's book, its copyrights, trademark and distinctive tradedress, creating a false impression of affiliation, origin and connection with the Plaintiff and its goodwill. The advertising, posting, and sale related to Offending Use is not authorized and a violation of Global Brother's intellectual property rights.

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17. To safeguard its intellectual property rights, mitigate damages and consumer

confusion, on or about May 22, 2025, Plaintiff filed a Digital Millennium Copyright Act (DMCA)

notice with SHOPIFY. Following Plaintiff's complaint, the Offending Use was suspended.

18. On or about June 4, 2025, having waited no time to review or investigate the claim,

Defendant filed a Counter-Notice, asserting the Offending Use was lawful. Under SHOPIFY's

policy subject to the DMCA, the Offending Use may be reinstated within 14 business days from

filing the Counter-Notice, unless Plaintiff files a federal lawsuit (Exhibit B, Counter-Notice,

SHOPIFY email).

19. On June 6, 2025, Plaintiff sent correspondence to Defendant confirming Plaintiff's

ownership rights in and to THE LOST BOOK OF HERBAL REMEDIES and requested information

from Defendant to seek resolution and avoid litigation (Exhibit C). Plaintiff has sent follow-up

communications to Defendant urging a response, however the Defendant remained silent, causing

the instant dispute to be resolved through litigation.

20. Plaintiff hereby seeks assistance to enforce its statutory rights, prevent ongoing and

future harm, and receive associated damages. Defendant's wrongful acts, including associated

infringement and advertising, have caused irreparable harm to Plaintiff, its goodwill, and financial

interests. Plaintiff has suffered and will continue to suffer damages unless Defendant is enjoined.

CLAIMS FOR RELIEF

COUNT I COPYRIGHT INFRINGEMENT

[17 US CODE § 501]

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- 21. Plaintiff realleges and incorporates by reference allegations of ¶¶ 1-20 as though fully set forth herein.
- 22. Plaintiff is the lawful owner of valid and enforceable U.S. Copyright Registrations for the book, THE LOST BOOK OF HERBAL REMEDIES, including its contents and cover artwork, which confer exclusive rights under 17 U.S.C. § 106, including the rights to reproduce, distribute, display, and create derivative works based on the copyrighted material.
- 23. Defendant, without authorization or consent, willfully and unlawfully reproduced, distributed, and displayed counterfeits and/or unauthorized copies of Plaintiff's copyrighted materials in violation of 17 U.S.C. § 501 continuously from the time beginning from at least as early as before June 2025, to present. Acts of infringement occurred after the Plaintiff received its copyright registration(s).
- 24. Defendant's actions constitute willful infringement as defined under the Copyright Act, entitling Plaintiff to enhanced statutory damages under 17 U.S.C. § 504(c). Under 17 U.S.C. § 505, Plaintiff seeks recovery of its attorneys' fees, costs, and expenses incurred in this action because of Defendant's infringing activities.
- 25. As a direct and proximate result of the Defendant's infringing acts, the Plaintiff suffered and will continue to suffer irreparable harm and economic damages for which there is no adequate remedy at law. Unless enjoined and restrained by this Court, the foregoing infringing acts will continue to cause irreparable injury to Plaintiff.
- 26. Pursuant to 17 U.S.C. §§502 and 503, Plaintiff is entitled to injunctive relief prohibiting further importing, advertising, using, making, or infringing the protections under Global Brother U.S. Copyright Registrations, and ordering all unauthorized copies that shall exist, to be destroyed or forfeited.

COUNT II UNFAIR COMPETITION AND FALSE DESIGNATION OF ORIGIN [15 U.S.C. § 1125(a)]

- 27. Plaintiff realleges and incorporates by reference allegations of ¶¶ 1-20 as though fully set forth herein.
- 28. Plaintiff owns enforceable common law trademarks and trade dress rights in and to the non-functional, unique designs of its book, cover and title (the trade dress and title marks collectively referred to as "Plaintiff's Trademarks").
- 29. The Plaintiff's Trademarks have been in continuous use in U.S. interstate commerce by Plaintiff prior to any date which can be legally claimed by the Defendant.
- 30. Plaintiff's Trademarks are inherently distinctive and/or have acquired distinctiveness and secondary meaning based on substantial promotion, sales, marketing, and use in U.S. commerce. Consumers associate the unique titles, unique pattern-design of the books as originating exclusively from Plaintiff.
- 31. Defendant's unauthorized use of Plaintiff's trade dress, titles, and overall designs constitutes false misleading representations of fact that is likely to cause confusion or mistake, or to deceive the public as to the origin, sponsorship, or approval, false description, and unfair competition in violation of Section 43(a) of the Lanham Act (15 U.S.C. § 1125(a)).
- 32. As a direct and proximate result of the foregoing acts, Plaintiff has suffered injury, including irreparable injury, and damages, including lost profits, royalties, and other damages in an amount to be determined at trial, and continues to suffer irreparable harm, loss of goodwill, and monetary damages as a direct result of Defendant's unfair competition.

33. Plaintiff seeks damages, including Defendant's profits, actual damages, and costs, pursuant to 15 U.S.C. § 1117(a), as well as injunctive relief to prevent further acts of unfair competition. And because Defendant's acts were willful, this is an exceptional case making the Plaintiff eligible for an award of attorneys' fees under 15 U.S.C. § 1117.

COUNT III VIOLATION OF ILLINOIS DECEPTIVE TRADE PRACTICES ("DTPA") (815 ILCS 510/1 et seq.)

- 34. Plaintiff realleges and incorporates by reference allegations of ¶¶ 1-20 as though fully set forth herein.
- 35. The DTPA prohibits unfair methods of competition, unconscionable acts or practices, and unfair or deceptive acts or practices in the conduct of any trade or commerce to protect consumers and legitimate business entities from harm caused by such unlawful practices.
- 36. Defendant engaged in conduct that violates DTPA by advertising, offering for sale, and attempting to distribute a counterfeit version of Plaintiff's THE LOST BOOK OF HERBAL REMEDIES, which included modifying the title to THE LOST BOOK OF <u>HERBS</u>.... This conduct is unfair and deceptive for the following reasons:
 - a. Deceptive Representation of the Book's Origin: Defendant was aware of the popularity of THE LOST BOOK OF HERBAL REMEDIES and deliberately replicated/modified the title, trade dress, and cover design of Plaintiff's book, misleading consumers into believing the infringing book is either affiliated with, authorized by, or a genuine product of Plaintiff.
 - b. False and Misleading Advertising: Defendant used deceptive advertisements on SHOPIFY that prominently displayed a counterfeit version of Plaintiff's books creating confusion among consumers about the source and quality of the product.

- c. Use of a Knockoff Product to Mislead Consumers: Defendant mimicked Plaintiff's distinctive trade dress and design to unlawfully capitalize on the goodwill, reputation, and established consumer trust associated with Plaintiff's book.
- d. This tactic was designed to confuse consumers while evading detection by Plaintiff and online platforms such as SHOPIFY.
- e. Harm to Consumers: consumers who purchased the infringing books received a counterfeit product that was not authorized or endorsed by Plaintiff. This deception caused consumers to suffer financial loss and diminished trust in Plaintiff's brand.
- 37. To preserve the integrity of evidence, Plaintiff seeks an injunction to preserve all potentially relevant electronic evidence, including, but not limited to: a) data from SHOPIFY accounts, including sales records, customer communications, and financial transactions related to the infringing book; b) all financial records connected to the infringing book, including revenue, expenses, and profit calculations; c) design files, production records, and any related communications concerning the development or manufacture of the infringing book; d) customer communications and data, including complaints, inquiries, or feedback regarding the infringing book; e) records of supplier and distributor relationships, including financial data and agreements.
- 38. As a direct and proximate result of Defendant's deceptive acts and practices, Plaintiff has suffered significant harm, including but not limited to loss of sales and market share due to diverted business, damage to reputation and goodwill, and consumer confusion that undermines trust in Plaintiff's authentic product.
- 39. Defendant's actions constitute violations of the Illinois Uniform Deceptive Trade Practices Act, 815 ILCS 510/2(a), including but not limited to: (1) passing off goods as those of

another; (2) causing likelihood of confusion as to the source, sponsorship, or approval; and (3) misrepresenting affiliation with Plaintiff. Plaintiff seeks injunctive relief under 815 ILCS 510/3.

COUNT IV UNJUST ENRICHMENT (ILLINOIS LAW)

- 40. Plaintiff realleges and incorporates by reference allegations of ¶¶ 1-20 as though fully set forth herein.
- 41. Defendant has unlawfully benefitted from the unauthorized use of Plaintiff's intellectual property, deriving substantial revenue and goodwill at Plaintiff's expense. Under Illinois common law, Defendant has been unjustly enriched by deriving financial benefit from Plaintiff's intellectual property without authorization, to Plaintiff's detriment. Equity and good conscience require restitution.
- 42. Defendant used Plaintiff's distinctive book title, trade dress, and associated goodwill to market and sell unauthorized, counterfeit copies, and/or knock-offs of Plaintiff's THE LOST BOOK OF HERBAL REMEDIES.
- 43. Defendant willfully, knowingly, and with wanton disregard replicated Plaintiff's unique books design, including the layout, patterns, and color scheme of Plaintiff, to deceive consumers into purchasing the Defendant's book instead a genuine THE LOST BOOK OF HERBAL REMEDIES book.
- 44. By capitalizing on Plaintiff's intellectual property and goodwill, Defendant unjustly obtained significant financial benefits, including but not limited to: revenue generated from the sale of counterfeit books; cost savings by avoiding investment in original design, marketing, and branding efforts; and consumer trust and market recognition built upon Plaintiff's established reputation. Defendant unjustly retained that benefit.

- 45. Plaintiff never authorized Defendant to use its intellectual property or to benefit from its reputation and goodwill. Defendant's unauthorized use constitutes unlawful conduct that has harmed Plaintiff financially and reputationally. Plaintiff's expense or detriment enabled the enrichment.
- 46. Defendant knew or should have known said actions were unauthorized, unlawful, and performed directly at Plaintiff's expense. Defendant acted willfully and deliberately to exploit Plaintiff's intellectual property for financial gain, with full knowledge that it had no right to do so.
- As a direct and proximate result of Defendant's conduct, Plaintiff suffered significant harm, including loss of revenue and market share due to diverted sales; reputational harm caused by consumer confusion and association with counterfeit goods; and diminished goodwill in the marketplace. Equity and good conscience require that Defendant disgorge all profits and other financial benefits unjustly obtained through the wrongful conduct.
- 48. Plaintiff is entitled to restitution of all ill-gotten gains and any other equitable relief deemed just by this Court. Equity demands that Defendant should not be permitted to retain the benefits unjustly obtained through their wrongful conduct. Plaintiff is entitled to restitution of all ill-gotten gains and profits, as well as any other equitable relief this Court deems just and proper to prevent Defendant from further unjust enrichment at Plaintiff's expense.

COUNT V TORTIOUS INTERFERENCE WITH BUSINESS RELATIONSHIPS (ILLINOIS LAW)

- 49. Plaintiff realleges and incorporates by reference allegations of ¶¶ 1-20 as though fully set forth herein.
- 50. Plaintiff has established and ongoing business relationships with its customers, distributors, and online retailers, where Plaintiff's book(s) "THE LOST BOOK OF HERBAL

REMEDIES" are sold, including on-line. These relationships are built on trust, reputation, and consistent delivery of authentic, high-quality products.

- 51. Defendant, with knowledge of these relationships, intentionally and unjustifiably interfered by introducing counterfeit goods into the market, diverting sales and eroding consumer trust in Plaintiff's authentic product.
- 52. Defendant was aware, or should have been aware, of Plaintiff's business relationships and the goodwill associated with its intellectual property. This knowledge is evidenced by Defendant's deliberate replication of Plaintiff's title, trade dress, and book design, with intentional changes to avoid detection, target, and exploit Plaintiff's customer base and online retail channels.
- 53. Defendants intentionally and unjustifiably interfered with Plaintiff's business relationships by engaging in the following actions: Advertising and selling counterfeit versions of Plaintiff's books, thereby diverting sales from Plaintiff's legitimate product; Creating consumer confusion by mimicking Plaintiff's trade dress and title, leading customers to believe they were purchasing Plaintiff's authentic product undermining Plaintiff's ability to protect its intellectual property rights and maintain its business relationships.
- 54. Defendant's conduct was not privileged, justified, or excused. Their actions were willful and malicious, intended to profit at Plaintiff's expense by exploiting Plaintiff's established reputation and business relationships.
- 55. As a direct and proximate result of Defendant's tortious interference, Plaintiff has suffered significant harm, including but not limited to: Loss of sales and revenue due to diverted business opportunities; Damage to its reputation and goodwill, as consumers mistakenly associate the counterfeit goods with Plaintiff's brand; Impairment of its business relationships with

customers and online platforms, which rely on Plaintiff's ability to deliver authentic and trusted products.

56. Plaintiff seeks actual and compensatory damages for the financial and reputational harm caused by Defendant's interference. Plaintiff further seeks punitive damages to deter Defendant and others from engaging in similar wrongful conduct, as well as any other equitable relief this Court deems just and proper.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests judgment in its favor and against Defendant as follows:

- Preliminary and permanent injunctive relief prohibiting Defendant's from further infringing, unfair competition, and deceptive practices;
 - Statutory damages under the Lanham Act and Copyright Act.
 - · Actual damages, including lost profits and compensation for reputational harm.
 - Treble damages for willful violations of the Lanham Act under 15 U.S.C. § 1117.
 - · Disgorgement of Defendant's profits from infringing activities.
 - Attorneys' fees, costs, and expenses under 15 U.S.C. § 1117 and Illinois law.
- · An order requiring destruction or forfeiture of all infringing materials in Defendant's possession.
 - · Restitution for unjust enrichment under Illinois law.

Any additional relief the Court deems just and equitable.

Dated: June 20, 2025.

Regas & Dallas P.C.

By: s/William D. Dallas

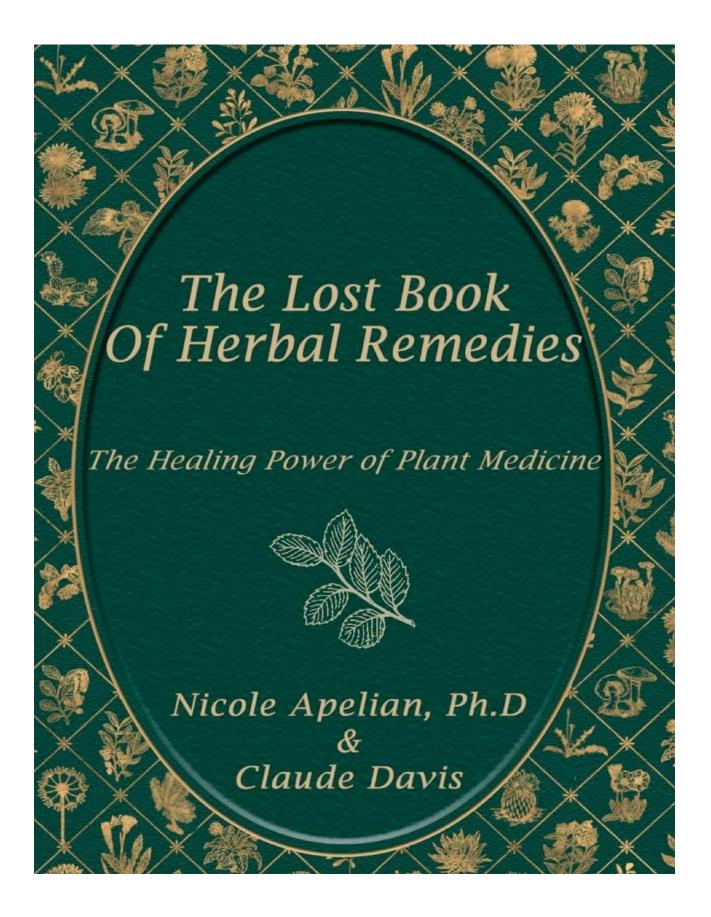
One of its attorneys for Plaintiff, GLOBAL BROTHER SRL

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EXHIBIT A

GLOBAL BROTHER Copyrights



Type of Work: Text

Registration Number / Date:

TX0009021932 / 2021-10-19

Application Title: The Lost Book of Herbal Remedies.

Title: The Lost Book of Herbal Remedies.

Description: Electronic file (eService)

Copyright Claimant:

Global Brother SRL, Transfer: By written agreement.

Date of Creation: 2019

Date of Publication:

2019-07-07

Nation of First Publication:

United States

Authorship on Application:

Claude Davis; Domicile: Romania; Citizenship: Romania.

Authorship: text, photograph(s)

Nicole Apelian; Domicile: Romania; Citizenship: Romania.

Authorship: text, photograph(s)

Previous Registration:

2018, TX0008719391.

Pre-existing Material:

text, photograph(s)

Basis of Claim: text, photograph(s)

Rights and Permissions:

Claudiu Alexandru Giurgi, Global Brother SRL, Ghiozdanului

22A Lighthouse Residence - ap 12A floor 1, 12A,

Bucharest, 014163, Romania, +40768434324,

giurgi.claudiu@yahoo.com

Copyright Note: C.O. correspondence.

ISBN: 978-1-7354815-5-5

Names: Davis, Claude

Apelian, Nicole Global Brother SRL

Type of Work: Visual Material

Registration Number / Date:

VA0002369247 / 2023-08-16

Application Title: The Lost Book of Herbal Remedies Book Cover.

Title: The Lost Book of Herbal Remedies Book Cover.

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Description: Electronic file (eService)

Copyright Claimant:

Global Brother SRL.

Date of Creation: 2019

Date of Publication:

2019-07-07

Nation of First Publication:

United States

Authorship on Application:

Global Brother SRL, employer for hire; Domicile: Romania.

Authorship: 2-D artwork.

Rights and Permissions:

Mandour & Associates, APC, 8605 Santa Monica Blvd., Suite

1500, Los Angeles, CA, 90069, United States

Names: Global Brother SRL

Type of Work: Text

Registration Number / Date:

TX0009411164 / 2024-06-03

Application Title: THE LOST BOOK OF HERBAL REMEDIES.COM.

Title: THE LOST BOOK OF HERBAL REMEDIES.COM.

Description: Electronic file (eService)

Copyright Claimant:

GLOBAL BROTHER SRL.

Date of Creation: 2021

Date of Publication:

2021-03-25

Nation of First Publication:

United States

Authorship on Application:

GLOBAL BROTHER SRL, employer for hire; Domicile: Romania;

Citizenship: Romania. Authorship: text, photograph(s)

Pre-existing Material:

previously published version.

Rights and Permissions:

Claudiu Alexandru Giurgi, GLOBAL BROTHER SRL, Ghiozdanului,

no 22A, Floor 1, Office A12, Room 1, Bucharest, Romania,

014163, Romania, +40768434324,
claudedaviscopyright@gmail.com

Copyright Note: C.O. correspondence.

Regarding authorship information: Deposit indicates some

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text by other sources.

Names: GLOBAL BROTHER SRL

Type of Work: Dramatic Work and Music; or Choreography

Registration Number / Date:

PA0002339379 / 2022-02-25

Application Title: The Lost Book of Herbal Remedies Commercial Script.

Title: The Lost Book of Herbal Remedies Commercial Script.

Description: Electronic file (eService)

Copyright Claimant:

Global Brother SRL.

Date of Creation: 2019

Date of Publication:

2019-09-15

Nation of First Publication:

United States

Authorship on Application:

Global Brother SRL, employer for hire; Domicile: Romania.

Authorship: text.

Rights and Permissions:

Joseph A. Mandour, Mandour & Associates, APC, 8605 Santa

Monica Blvd., Suite 1500, Los Angeles, CA, 90069, United

States, jmandour@mandourlaw.com

Names: Global Brother SRL

Type of Work: Text

Registration Number / Date:

TXu002422674 / 2024-03-27

Application Title: The Lost Book of Herbal Remedies II The Healing Power of

Plant Medicine.

Title: The Lost Book of Herbal Remedies II The Healing Power of

Plant Medicine.

Copyright Claimant:

GLOBAL BROTHER SRL.

Date of Creation: 2024

Authorship on Application:

GLOBAL BROTHER SRL (author of anonymous contribution),

employer for hire; Domicile: Romania; Citizenship:

Romania. Authorship: text, photograph(s)

Rights and Permissions:

Claudiu Alexandru Giurgi, GLOBAL BROTHER SRL, Ghiozdanului, no 22A, Floor 1, Office A12, Room 1, Bucharest, Romania, 014163, Romania, +40768434324, claudiu.giurgi@yahoo.com

Names: GLOBAL BROTHER SRL

Type of Work: Text

Registration Number / Date:

TX0009431664 / 2024-09-12

Application Title: THE LOST BOOK OF HERBAL REMEDIES II.website.

Title: THE LOST BOOK OF HERBAL REMEDIES II.website.

Description: Electronic file (eService)

Copyright Claimant:

GLOBAL BROTHER SRL.

Date of Creation: 2024

Date of Publication:

2024-05-24

Nation of First Publication:

United States

Authorship on Application:

GLOBAL BROTHER SRL, employer for hire; Domicile: Romania; Citizenship: Romania. Authorship: text, photograph(s)

Pre-existing Material:

text, photograph(s)

Basis of Claim: text, photograph(s)

Rights and Permissions:

Claudiu Alexandru Giurgi, GLOBAL BROTHER SRL, Ghiozdanului, no 22A, Floor 1, Ap A12, Room 1, Bucharest, Romania, 014163, Romania, +40768434324, legal@globalbrother.com

Copyright Note: C.O. correspondence.

Names: GLOBAL BROTHER SRL

EXHIBIT B

OFFENDING USE

- Offending Website
- Counter-Notice, Notification email from SHOPIFY
- Counter-Notice

Saving Solutions

Catalog Backyard & Patio Bathroom Bedroom Books Crafts Electronics Gardening Health & Wellness Kitchen

The Lost Book
Of Herbal Remedies
The Healing Power of Plant Medicine
Nicole Apelian, Ph.D
Claude Davis











Saving Solutions Shop

The Lost Book of Herbs: The Healing Powers of Plant Medicines

\$29.99 USD

Shipping calculated at checkout.

Pay over time for orders over \$35.00 with shop to Learn mo

United States



Add to cart

more payment optio

The Lost Book of Herbs: The Healing Powers of

Age: ADULT

CONSISTION: NEW

anguage: English

304-page color softcover with higher quality

printing and more plant identification

This unique book was co-authored by Dr. Micole Apelian, an herbalist with over 20 years of plant research experience, and claude bavis, a Wild West expert who is passionate about the lost remedies and wild edible plants that allowed previous generations to survive.

The Lost Book of Herbal Remedies contains color images of over IBI Morth American medicinal plants, Lichnes, and mushroons (2-4 images per plant for easy identification), in the book you will also find 559 powerful natural remedies for every one of your everyday needs. Many of these remedies have been used by our ancestors for hundreds of years, while others come from Dr. Nicoles extensive natural practice.

This book is for those who have no plant knowledge and are looking for alternative ways to help themselves or their family.

You may also like



Barden House Book Nook Ki Book Shelf Insert Easy Azzemble \$44.99 USD



Garden Shed DIY Book Nook Kit with Furniture and LED Lamp 3D Puzzle \$46.99 USD



Raised Garden Bed Set, Large Steel Flower Planters, Easy Assembly. \$193.99 USD



Outdoor Potting Bench Tabl Potters Benches Garden Workstation

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wail

Jason L DeFrancesco

From: Shopify <legal@shopify.com>
Sent: Wednesday, June 4, 2025 5:52 AM

To: legal@GlobalBrother

Subject: DMCA copyright notice I savingsolutionsshop.com

Hi there,

We have received a counter notice in response to the *Digital Millennium Copyright Act* takedown notice you submitted on 2025-05-22 13:37:19 UTC about savingsolutionsshop.com.

In accordance with the provisions of the *Digital Millennium Copyright Act*, the removed content listed in the counter notice may be reposted, within 10-14 business days following receipt of the counter notice, unless Shopify receives notice that you have filed a legal action seeking a court order to restrain the merchant from engaging in infringing activity.

Shopify Trust & Safety

Ticket ID: b6c56fc2-0291-4a0a-aeb4-9582d454ddfe



151 O'Connor Street, Ground floor, Ottawa, ON, K2P 2L8



Date: June 06, 2025

DMCA Counter Notice | savingsolutionsshop.com

l. Shopify Merchant Contact Information
First Name: William
Last Name: Gibson
Phone: 2244303730
Email: savingsolutionsshop@gmail.com
Address: 1113 16th avenue na
City: Rockford
ZIP/Postal Code:: 61104
Country: United States
State/Province: Illinois

2. Material(s) Subject to the Counter Notice

Report ID:

b6c56fc2-0291-4a0a-aeb4-9582d454ddfe

• https://savingsolutionsshop.com/products/the-lost-book-of-herbs-the-healing-powers-of-plant-medicines? pos=18 sid=b7c31ca9a& ss=r

3. Declarations

- I consent to the jurisdiction of the Federal District Court for the judicial district in which my address listed above is located or, if my address listed above is located outside of the United States, I consent to the jurisdiction of the Federal District Court for the District of Delaware.
- I will accept service of process from the party who submitted the DMCA Takedown Notice referred to above or its agent.
- I swear, under penalty of perjury, that I have a good faith belief that the affected content was removed as a result of a mistake or misidentification of the content to be removed.

4. Electronic Signature

William Gibson

EXHIBIT C



office@defrancesco.law

June 6, 2025

Via email: savingsolutionsshop@gmail.com, bgrealty1@comcast.net

William Gibson Gibson Realty 1113 16th Avenue Rockford, IL 61104 (224) 430-3730

> RE: Global Brother Srl adv Gibson et al.; DMCA, SHOPIFY, Report ID: b6c56fc2-0291-4a0a-aeb4-9582d454ddfe

Dear William Gibson,

DeFrancescoLaw represents Global Brother SRL ("Global Brother"), a Romanian publisher of various materials and publications, including health and wellness books. One of its most popular books, and Amazon best seller, is THE LOST BOOK OF HERBAL REMEDIES ("LOST BOOK")(attached).

The LOST BOOK, its contents and cover, are protected under U.S. Copyright laws. See, inter alia, U.S. Copyright registration nos. TX0009021932 and VA0002369247. Due to Global Brother's extensive use, promotion, investment, the LOST BOOK has acquired distinctiveness, which is further protected by U.S. trademark laws.

It has come to our attention you are reproducing, distributing, advertising, and/or selling copies of The LOST BOOK through SHOPIFY platform via <savingsolutionsshop.com> without Global Brother authorization or consent - in violation of 17 U.S.C. §§ 101 et seq., 15 U.S.C. §§ 1125 et seq., and related federal and state business torts (screenshot of unauthorized use in next page).





The above shows the LOST BOOK cover, including images from the book. More importantly, the description in above has been modified (i.e., "HERBS") which is a tactic commonly known to be used by unauthorized third parties to avoid being detected.



Not only does the foregoing injure Global Brother's business but also compromises the LOST BOOK goodwill and related intellectual property rights. To minimize damage, Global Brother filed a takedown of the unauthorized use, which caused it to be suspended by SHOPIFY. In response, you filed a Counter-Notice to reinstate the unauthorized use, which notice included the declaration that Global Brother made a "mistake" or "misidentification" as to its ownership rights. There is no record however of you having contacted Global Brother or investigated ownership in support your declaration.

Notwithstanding, your Counter-Notice now creates an obligation on Global Brother to file a federal lawsuit at the U.S. District Court for the Northern District of Illinois within 10-14 business days thereof (by June 18 - 24, 2025) to prevent the unauthorized use from reinstating.

Global Brother prefers to avoid legal action and settle the dispute, which if you are agreeable requires you:

- Immediately withdraw any and all Counter-Notice(s).
 Withdrawal can only be confirmed by <u>SHOPIFY directly communicating the</u> withdrawal to Global Brother.
- 2. Immediately cease and desist from advertising, reproducing, distributing, or selling any copies of Global Brother titles, including but not limited to THE LOST BOOK OF HERBAL REMEDIES in any format.
- 3. Provide written confirmation within 48 hours confirming compliance with this demand.
- 4. Disclose the following information:
 - · Inventory of books in your possession or control.
 - · Source(s) of the books.
 - · Detailed accounting of all sales, revenue, and profits derived from the books.
- 4. Reimburse Global Brother its damages.

Failure to fully respond to above and enter a written settlement agreement shall require Global Brother to file a lawsuit, which may potentially entitle it to return of legal fees, statutory damages (up to \$150,000 per work), injunctive relief, and destruction of all infringing materials, etc.



This letter does not constitute a comprehensive statement of rights, remedies, or claims, all of which are expressly reserved until such time as a written agreement is entered into between the parties.

Your immediate attention is requested.

Sincerely,

ປລຣວກ DeFrancesco